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March 16, 2022

Honorable Katharine H. Parker United States Magistrate Judge U.S. District Court 500 Pearl Street, Room 750 New York, NY 10007 Letter Motion: Extension of Time Request

**APPLICATION GRANTED** 

Hon. Katharine H. Parker, U.S.M.J

3/17/2022

Re: Glenn Barton v. Comm'r of SSA 1:21-cv-07924-AJN-KHP

Dear Honorable Judge Parker:

Pursuant to the Scheduling Order in the above referenced case, Plaintiff's motion for Judgment on the Pleadings is due on March 19, 2022. Due to the many administrative transcripts filed by the Defendant as he recovers from the pandemic backlog, Plaintiff's counsel has incurred a similar backlog and requires additional time to prepare his brief in this matter.

Plaintiff therefore writes to respectfully request an extension of time of sixty days (60) to serve her motion through and including May 18, 2022, with Defendant's cross motion due July 17, 2022, and Plaintiff's Reply due on August 7, 2022. No previous request for an extension has been made in this case and the Defendant has given consent.

Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre Eddy Pierre Pierre, Esq. Attorney for Plaintiff (646) 992-8383 (718) 504-6962 fax Cc: Susan C. Branagan, Esq. (Via ECF) Attorney for Defendant.